BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FIFTH SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS O'HARA (UPS/USPS-T30-7 through 8)

(August 18, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness O'Hara (UPS/USPS-T30-7 through 8).

Respectfully submitted,

John'E. McKeever Albert P. Parker Stephanie Richman

Attorneys for United Parcel Service

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INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS O'HARA

UPS/USPS-T30-7. Please confirm that an FY 1998 after-rates ratio of revenue to incremental cost for Parcel Post below 1 would be unacceptable to the Postal Service. If not confirmed, please explain.

UPS/USPS-T30-8. Please confirm that a subclass of mail with a ratio of revenue to incremental cost below 1 in a given year would be cross-subsidized by the other subclasses of mail. If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Stephanie Richman

Dated: August 18, 1997

Philadelphia, Pa.